



Most of the public participation and discussion at the May 24<sup>th</sup> meeting focused on environmental justice as it relates to pollution and minority and low-income communities. We certainly recognize that there are many urban communities in the State that are disproportionately impacted by pollution. However, without in anyway minimizing the significance of this issue, RCRC believes it is important to extend the environmental justice perspective by considering the impact of the development, adoption, implementation, and

enforcement of environmental laws, regulations, and policies to economically challenged rural areas of California. In general, rural counties have higher unemployment, lower average incomes, a greater percentage of elderly residents, and more poverty than other areas of the State. Please consider the following:

- In 2001, California's unemployment rate was 5.2%. Yet, the unemployment rate in Imperial County was over 21% and that in Colusa County was over 17%. Glenn, Madera, Merced, Sutter, Trinity, and Yuba Counties all had unemployment rates over 10%--more than twice the State average.
- In 1999, the median annual income in California was \$43,924. The median income for households in Butte, Del Norte, Glenn, Imperial, Lake, Modoc, Siskiyou, Tehama, Trinity, and Yuba Counties was \$30,000 or less – roughly a third below the State average.
- Many rural counties have a high percentage of their population below the “poverty level” when compared to the State average. Per capita personal income in California averaged \$32,149 in 2000. This compares to per capita personal income of only \$19,000 or less in Del Norte, Glenn, Lassen, Madera, Merced, Tehama, and Yuba Counties. In fact, 28 of RCRC's 30 member counties are below the State average and per capita income is less than 75% of the State average in 19 of our counties.
- Nine of the ten California counties whose population have the highest average age are rural. In 2003, the average age statewide was 37. The average age was 41 or higher in Amador, Calaveras, Inyo, Lake, Mariposa, Nevada, Plumas, Sierra, and Trinity Counties.

Given this information, RCRC believes that a comprehensive assessment of the degree to which State programs address environmental justice concerns must be extended beyond the urban areas. This is especially true when dealing with publicly funded government programs because the “per capita” cost of implementing these programs in rural areas of the State is considerably higher than the costs for similar program implementation in areas of greater population density. Residents in rural California typically have lower average incomes, yet the costs to provide service to these residents are disproportionately higher. We believe this is a significant environmental justice concern that has been overlooked.

To address these concerns, RCRC recommends that the Cal EPA Intra-Agency Environmental Justice Strategy be modified as follows:

Goal #1. Ensure meaningful public participation and promote community-capacity building to allow communities to be effective participants in environmental decision-making processes.

- While the stated objectives are helpful to promote citizen involvement, RCRC believes local government and locally elected officials need to be recognized as an integral part of the State's effort in this regard. RCRC recommends amending “Objective E” as follows:

“Enhance educational efforts and expand outreach to communities, stakeholders, *and local government staff and locally elected officials* working on environmental justice issues.”

- RCRC strongly encourages State agency outreach and participation at local community levels. When State regulatory or policy decisions may disproportionately impact rural areas, local rural community input should be made part of the State rule-making process. The State should conduct meetings in various rural regions to ensure the public and local government is made part of the process, and their issues and concerns are considered. RCRC recommends adding an additional criterion as follows:

*“Extend outreach efforts and conduct meetings in various rural regions of the State to ensure meaningful public and local government participation when State regulatory or policy decisions may disproportionately impact rural areas.”*

Goal #2. Integrate environmental justice into the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.

- Five criteria were outlined to identify and address environmental justice gaps in Cal/EPA programs, policies, or activities. RCRC recommends adding an additional criterion as follows:

*“Consider any disproportionate economic and/or social impact to areas, including rural counties, in development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.”*

- Additionally, we recommend adding an objective in support of Goal #2 as follows:

*“Consult local government and local elected officials, and consider their priorities and concerns prior to developing or revising program elements, rules, or policies.”*

RCRC would like to thank you again for the opportunity to comment on the Draft California Environmental Protection Agency Intra-Agency Environmental Justice Strategy. On behalf of our membership, I want to assure you of our interest and commitment to remain involved in this endeavor. RCRC looks forward to your response. You may contact me at (916) 447-4806.

Sincerely,

Mary Pitto  
Regulatory Program Director

Distribution to Members, Interagency Working Group:

Alan C. Lloyd, Ph. D., Chair ARB  
Linda Moulton-Patterson, Chair, CIWMB  
Arthur G. Baggett, Jr., Chair, SWRCB  
Edwin F. Lowry, Director, DTSC  
Paul Helliker, Director DPR  
Joan E. Denton, Ph.D., Director, OEHHA  
Jan Boel, Acting Director, OPR

cc: James Branham, Undersecretary, Cal/EPA  
Tam Doduc, Deputy Secretary, Cal/EPA  
Celeste Cantu, Executive Director, SWMCB  
Mark Leary, Executive Director, CIWMB  
Catherine Witherspoon, Executive Officer, ARB  
Brent Harrington, Regional Council of Rural Counties  
Regional Council of Rural Counties Board of Directors

*Document2*